

## **REMARKS**

### **1. Summary of Office Action**

In the Office action mailed August 11, 2004, the Examiner objected to claims 17, 18, and 20 because of informalities in these claims. The Examiner rejected claim 7 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. Further, the Examiner rejected claims 1-3, 5-20, and 22 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,693,878 B1 (Daruwalla et al.). Further still, the Examiner rejected claims 4 and 21 under 35 U.S.C. §103(a) as being unpatentable over Daruwalla et al. in view of U.S. Patent No. 6,628,649 (Raj et al.).

### **2. Amendments and Pending Claims**

In the specification, the paragraphs starting at (i) page 20, line 3, (ii) page 21, line 7, (iii) page 25, line 3, (iv) page 26, line 10, and (v) page 26, line 21, were amended to correct typographical errors.

Applicants have also amended claims 1, 8, 11, 14, 17-18, and 20, have cancelled claim 2, and have added new claim 23. Claims 1 and 3-23 are presently pending in this application, of which claims 1, 8, 11, and 17 are independent.

### **3. Response to Claim Objections**

The Examiner objected to claims 17, 18, and 20 due to informalities of the claims. Applicants have amended claims 17 and 20 to address the informalities. Applicants submit that claims 17, 18, and 20 are in proper condition for allowance.

### **4. Response to §112 Rejections**

The Examiner rejected claim 7 as being indefinite for failing to particularly point out and distinctly claim the subject matter of the invention. In particular, the Examiner indicated that it

is unclear how a destination identifier could be created in claim 7 when the destination identifier already exists in claim 1. Applicants respectfully traverse the rejection of pending claim 7 because claim 7 distinctly claims subject matter of the invention and is not indefinite.

As stated in the specification (see, e.g., page 29, lines 13-14), the claims should not be read as limited to the described order or elements unless stated to that effect. In particular, claim 7 depends from claim 1 and includes all of the limitations of claim 1. Moreover, claim 7 does not recite any limitation that the step of receiving a message from the first host occurs before the step of establishing a routing path. Accordingly, there is no conflict raised by the recital in claim 7 that the destination identifier is created during the step of establishing the routing path. Thus, Applicants submit that claim 7 is in proper condition for allowance.

**5. Response to §103 Rejections of Claims 1-3, 5-20, and 22 over Daruwalla et al.**

The Examiner rejected claims 1-3, 5-20, and 22 as being unpatentable over Daruwalla et al. Applicants respectfully traverse the obviousness rejection of pending claims 1, 3, 5-20, and 22 because Daruwalla et al. fails to disclose or suggest all of the limitations of any of these claims.

In particular, Daruwalla et al. fails to disclose or suggest (i) a method of establishing a routing path between a first host on a first network and one of a plurality of hosts on a second network, where the plurality of hosts on the second network *share a globally-routable network address*, as recited in claims 1 and 11, or (ii) a system that includes a plurality of local hosts on a second network, where the plurality of local hosts have a plurality of physical network addresses and share a globally-routable network address, as recited in claim 8, or (iii) a system that includes a centralized routing module for generating a routing table for a switch module

associated with a plurality of network entities that share a globally-routable network address, as recited in claim 17.

In contrast, Daruwalla et al. suggests a plurality of cable modems that are each assigned, by a DHCP server, a *specific IP address* selected from a *range of IP addresses* for each respective MAC address associated with each of the plurality of cable modems.

In rejecting claims 8, 11, and 17, the Examiner indicated that Figure 6 shows that several MAC addresses share an IP address, or in other words that they have a globally-routable network layer address. Applicants submit, however, that Figure 6 shows a MAC address/IP address mapping table in which each MAC address is associated with a specific range of IP addresses. Thus, Daruwalla et al. suggests that, when a DHCP server receives an IP address request from a specific cable modem, the server uses the MAC address of that cable modem to determine the appropriate address range from which to select and assign an IP address to the requesting cable modem based upon the table. (See, e.g., Daruwalla et al. Col. 10, lines 44-55). Thus, Applicants submit that Daruwalla et al. does not teach or suggest the plurality of hosts (or network entities) that share a globally-routable network address, as presently recited in claims 1, 8, 11, and 17.

Because Daruwalla et al. fails to disclose or suggest all of the limitations of claims 1, 8, 11, and 17, a prima facie case of obviousness of these claims does not exist. Further, because each of claims 3, 5-7, 9-10, 12-16, and 18-20, and 22 depend from either claim 1, 8, 11, or 17, a prima facie case of obviousness based on Daruwalla et al. for these claims does not exist.

**6. Response to §103 Rejections of Claims 4 and 21 over a Combination of Daruwalla et al. and Raj et al.**

The Examiner rejected claims 4 and 21 as being unpatentable over Daruwalla et al. in view of Raj et al. Applicants respectfully traverse the obviousness rejection of pending claims 4

and 21 because the combination of Daruwalla et al. and Raj et al. fails to disclose or suggest all of the limitations of any of these claims.

Claim 4 depends from claim 1 and thus incorporates all of the limitations of claim 1. Claim 21 depends from claim 17 and thus incorporates all of the limitations of claim 17. For the reasons stated above, Daruwalla et al. fails to render obvious the invention of claims 1 and 17. Further, Applicants do not find that Raj et al. overcomes the deficiency of Daruwalla et al. Consequently, Applicants submit that the combination of Daruwalla et al. and Raj et al. fails to render obvious the invention of claims 1 and 17 and thus fails to render obvious the invention of dependent claims 4 and 21.

Because the combination of Daruwalla et al. and Raj et al. fail to disclose or suggest all of the limitations of claims 4 and 21, a prima facie case of obviousness of these claims does not exist.

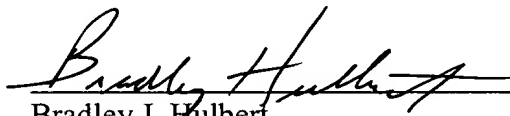
## **7. Conclusion**

Applicants respectfully submit that claims 1 and 3-23 are now in a condition for allowance, and respectfully request favorable reconsideration and prompt allowance of the claims. If the Examiner would like to discuss this case, the Examiner is welcomed to contact the undersigned at (312) 913-2122.

Respectfully submitted,

Date: November 5, 2004

By:

  
Bradley J. Hulbert  
Reg. No. 30,130